

Mrs. Williams is the widow of Marvin Williams, Sr. and will testify live or by deposition (discovery and trial video deposition, taken in this case) Mrs. Williams will testify as to the changes that occurred in Decedent Marvin Williams' lifestyle, his physical and mental health, and the damages incurred as a result of his asbestos-related disease, malignant mesothelioma and subsequent death. These damages include mental anguish, pain and suffering, expenses incurred and loss of enjoyment of a full and complete life, both in the past and in the future. She will also testify about her own past, present and future loss of consortium. Mrs. Williams will also will testify as to Decedent Marvin Williams, Sr.'s exposure to asbestos-containing products manufactured, sold and/or distributed by Defendants herein. Mrs. Williams will also testify as to any other matter or condition relevant to this cause of action.

Pamela Hall (Daughter of Decedent Marvin Williams, Sr.)
Via Plaintiffs' Counsel
Richmond, Texas

Pamela Hall is the adult daughter of Decedent Marvin Williams, Sr. She may testify as to the changes that occurred in Decedent's lifestyle, his physical and mental health, and the damages incurred as a result of Decedent's asbestos-related disease, malignant mesothelioma. These damages include mental anguish, pain and suffering, and loss of enjoyment of a full and complete life, both in the past and in the future. She may also testify about her own past, present and future loss of consortium.

Charisse Wheeler (Daughter of Decedent Marvin Williams, Sr.)
Via Plaintiffs' Counsel
Sicklerville, NJ

Charisse Wheeler is the adult daughter of Decedent Marvin Williams, Sr. She may testify as to the changes that occurred in Decedent's lifestyle, his physical and mental health, and the damages incurred as a result of Decedent's asbestos-related disease, malignant mesothelioma. These damages include mental anguish, pain and suffering, and loss of enjoyment of a full and complete life, both in the past and in the future. She may also testify about her own past, present and future loss of consortium.

Terrell Chambers (Son of Decedent Marvin Williams, Sr.)
Via Plaintiffs' Counsel
Miami, FL

Terrell Chambers is the adult son of Decedent Marvin Williams, Sr. He may testify as to the changes that occurred in Decedent's lifestyle, his physical and mental health, and the damages incurred as a result of Decedent's asbestos-related

disease, malignant mesothelioma. These damages include mental anguish, pain and suffering, and loss of enjoyment of a full and complete life, both in the past and in the future. He may also testify about his own past, present and future loss of consortium.

Marvin Williams, Jr. (Son of Decedent Marvin Williams, Sr.)
Via Plaintiffs' Counsel
The Colony, Texas

Marvin Williams, Jr. is the adult son of Decedent Marvin Williams, Sr. He may testify as to the changes that occurred in Decedent's lifestyle, his physical and mental health, and the damages incurred as a result of Decedent's asbestos-related disease, malignant mesothelioma. These damages include mental anguish, pain and suffering, and loss of enjoyment of a full and complete life, both in the past and in the future. He may also testify about his own past, present and future loss of consortium.

Barbara Davis (Sister of Decedent Marvin Williams, Sr.)
Via Plaintiffs' Counsel
Philadelphia, PA

Barbara Davis is the sister of Decedent Marvin Williams, Sr. She may testify as to the changes that occurred in Decedent's lifestyle, his physical and mental health, and the damages incurred as a result of Decedent's asbestos-related disease, malignant mesothelioma. These damages include mental anguish, pain and suffering, and loss of enjoyment of a full and complete life, both in the past and in the future. Mrs. Davis will also testify as to Decedent Marvin Williams, Sr.'s exposure to asbestos-containing talcum powder products manufactured, sold and/or distributed by Defendants herein.

Plaintiffs reserve the right to supplement this response as Plaintiffs' investigation continues.

- (ii) **a copy-or a description by category and location-of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody or control and may use to support its claims or defenses, unless the use would be solely for impeachment;**

See Plaintiffs' Discovery Responses, Decedent's Exposure History Sheet, medical records, billing records, social security records, military records, and/or authorizations which have been and will be produced in this case. Plaintiffs reserve the right to supplement this response as Plaintiffs' investigation continues.

- (iii) **a computation of each category of damages claimed by the disclosing party-**

who must also make available for inspection and copying under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered;

The categories of damages in this case will include without limitation past medical expenses, other special damages, loss of consortium and mental suffering and emotional distress of Decedent and his family members, damages for Decedent's pain, suffering, mental anguish, emotional distress, disfigurement, general damages, and punitive damages. Calculations of non-economic damages are within the province of the jury. Plaintiffs reserve the right to revise this list of damages as discovery progresses.

Plaintiffs are making a lost wages claim in this case and will provide a computation when available. For purposes of medical damages, see Decedent's medical billings records that have been or will be produced in this case. Plaintiffs reserve the right to supplement this request pursuant to the Federal Rules of Civil Procedure. Plaintiffs may rely upon the testimony of treating doctors, as well as medical experts as to the reasonable and necessary medical expenses.

- (iv) **for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Not applicable as to Plaintiffs.

Dated: April 9, 2020

SIMON GREENSTONE PANATIER, PC

/s/Dana C. Simon

Dana C. Simon (Admitted *pro hac vice*)

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